

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.,

Plaintiff,

v.

HP INC.,

Defendant.

Case No. 2:25-cv-00069-JRG

Lead Case

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:24-cv-00070-JRG

**DECLARATION OF NEIL A. RUBIN IN SUPPORT OF COUNTERCLAIM
DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS SAMSUNG
AMENDED COUNTERCLAIMS 1-2**

I, Neil A. Rubin, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ, August & Kabat, and counsel of record for Wilus Institute of Standards and Technology Inc., in the above-captioned actions. I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently thereto.

2. Attached as **Exhibit 1** is a true and correct copy of the Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond *In the Matter of Certain Video Capable Electronic Devices, Inc.*, No. 337-TA-1379, Public Version of Initial Determination (Feb. 10, 2025).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 23, 2025, at Los Angeles, California.

/s/ Neil A. Rubin
Neil A. Rubin